

#### REMARKS

Among original claims 1-25, method claims 1-8 are cancelled. Device claims 9-12, 14-16, 20-21 and 24 are pending, and remaining claims 13, 17-19, 22-23 and 25 are withdrawn.

The Examiner allowed claims 14-16, 20-21 and 24 and that claim 12 is also allowable if rewritten in independent form. Applicant gratefully acknowledges the Examiner's indication of allowable subject matter.

The Examiner objected to claims 9, 14 and 24 for certain informal matters apparently involving antecedent basis. Although Applicant respectfully disagrees with the Examiner, claims 9, 14 and 24 have been amended according to the Examiner's suggestion solely to advance prosecution of this application.

More substantively, the Examiner rejected claims 9-11 under 35 U.S.C. Section 103(a) as being obvious over Watrobski (US Patent No. 4878070) in view of Wong (US Patent No. 6328423). Applicant respectfully traverses the rejection.

Generally, the present invention will be explained, by way of example only, with reference to FIGS. 5 and 6 and the related description in the present specification.

The printed circuit board 13 has an insulating member 13a on which a plurality of terminal lands 60 and conductive wires 61 are disposed. Referring to FIG. 6, the insulating member 13a has two surfaces (top and bottom in the figure). The lands 60 are disposed on the top surface and a printhead is positioned underneath the insulating member so that the printhead terminals face the bottom surface and are connected to the lands on the top surface through the through-hole 62. A conductive brazing material such as solder is placed in the through-hole. The lands 60 are then aligned with the printhead terminals and heated so that the reflowed solder

securely connects the printed circuit board 13 to the printhead terminals.

In rejecting the claims, the Examiner equated the "dimples" in Watrobski to through-holes as claimed in claim 9. Applicant respectfully disagrees.

A "dimple" by any regular dictionary means a small depression or recess. According to Watrobski, the dimples are formed by embossing the base material beneath the conductive pads (col. 3, line 68 - col. 4, line 2) which is consistent with the dictionary meaning of small depressions. That means the dimples are not "through-holes" which require holes that go through both sides of a printed circuit board. Dimples are not through-holes as required by claim 9. Thus, Watrobski does not anticipate claim 9.

In FIG. 5 of Warobski, the surface shown in FIG. 4 of the flexible circuit 60 confronts the board 40, and the surface shown in FIG. 3 (first surface) of the board 40 faces away from the flexed circuit 60. On the flexed circuit 60, each pad 54 serves as the raised dimple pad 72. On the board 40, each pad 52 extends along the corresponding through hole 50 from the first surface of the board 40 that faces away from the flexed circuit 60 to the other surface (second surface) that faces the flexed circuit 60. A tip end of each pad 52 that is located on the second surface of the board 40 serves as the contact 70. Thus, the contacts 70 (printhead terminals) are located on the second surface of the board 40 that confronts the flexed circuit 60, and the raised dimple pads 72 are provided on the one surface of the flexible printed circuit board 60 that confronts the board 40.

Watrobski is also different from the present invention of claim 9 because claim 9 requires "the lands facing *through the through-holes* to the head terminals on the inkjet head". In other words, the lands that connect to the printhead terminals are disposed on a surface (e.g., top surface in FIG. 6) that

faces away from the printhead. By contrast, because the conductive pads of Watrobski face the printhead terminals, the pads are disposed on a surface (analogous to bottom surface in FIG. 6) that faces the printhead.

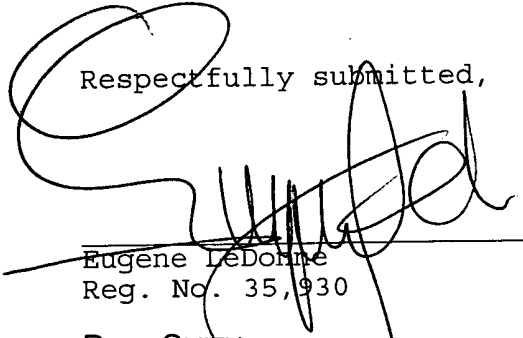
Moreover, according to claim 9, the "conductive brazing material" (e.g., solder) fixes the lands to the corresponding printhead terminals. By contrast, in Watrobski, there is no solder material that fixes the conductive pads to the printhead terminals because they are held to each other only by "pressure" (see col. 4, lines 12-14). Thus, Watrobski fails to anticipate claim 9 for a multitude of reasons.

Dependent claims 10-11 are also patentable by virtue of their dependency from independent claim 9.

Applicant also submits that claim 9 is a generic claim and that withdrawn claims 17-19, 22, 23 and 25 contain all the limitations of generic claim 9. Under 37 C.F.R. Section 1.141, upon the allowance of any generic claim, Applicants are entitled to consideration of claims to additional Species which are written in dependent form or otherwise include all the limitations of an allowed generic claim. Therefore, it is respectfully requested that withdrawn claim 13 depending on generic claim 9 as well as claims 17-19, 22, 23 and 25 also be allowed when generic claim 9 itself is allowed.

Based upon the above election, Applicant respectfully requests consideration of this application and its allowance. Should the Examiner feel that a telephone conference with Applicant's attorney would expedite the prosecution of this application, the Examiner is urged to contact him at the number indicated below.

Respectfully submitted,



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